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CONSTITUTIONAL LAW—CORPORATIONS—ESTOPPEL.—A railroad company, by incorporating under a general act, is estopped to contest the validity, under the federal constitution, of the provisions of that act regulating railroad rates, which formed one of the burdens attached by the statute to the privilege of becoming an incorporated body. *Grand Rapids etc. Railroad Co v. Osborn*, 24 Sup. Ct. 310. Citing *Daniels v. Tearney*, 102 U. S. 415.

CORPORATIONS—STOCKHOLDER'S LIABILITY—PLEDGE AS STOCKHOLDER.—EFFECT OF TRANSFER OF STOCK.—A transfer of bank stock on the books of the bank in favor of a pledgee which held it as collateral security does not render such pledgee liable as a stockholder for the bank's indebtedness created after the stock has been retransferred on the books of the pledgee upon payment of the loan, notwithstanding the pledgee's failure to give notice of the retransfer, which, under Ga. Code 1882, sec. 1496, is requisite to exempt from an existing individual liability as a stockholder under a corporate charter, where the stockholder's individual liability under the charter of the bank in question is limited to the par value of his stock "at the time the debt was created." *Brunswick Terminal Co. v. National Bank of Baltimore*, 24 Sup. Ct. 314.

EVIDENCE—ADMISSIBILITY OF, NOT AFFECTED BY MANNER OBTAINED—SELF-INCRIMINATION OF ACCUSED—DUE PROCESS OF LAW.—The admissibility of documentary evidence tending to establish the guilt of an accused of the offense charged is not affected because it was secured in violation of the constitutional prohibition against unreasonable searches and seizures.

The self-incrimination of an accused is not affected by the introduction in evidence against him of certain private papers found in the execution of a search warrant, where he did not take the witness stand in his own behalf, as was his privilege, and was not compelled to testify concerning the papers, or make any admission about them. *Adams v. New York*, 24 Sup. Ct. 372. Distinguishing *Boyd v. United States*, 116 U. S. 616.

REMOVAL OF CAUSES—JOINDER OF CO-DEFENDANT TO DEFEAT RIGHT.—In *Shaffer v. Union Brick Co.* (Cir. Ct., Dist. Kansas), 128 Fed. 97, the effect of the joinder in an action in a state court of a citizen of the same state with plaintiff as co-defendant with a non-resident is discussed. We call attention to it as an illustration of the manner in which courts will resent any attempt at a fraudulent taking away of their jurisdiction. The facts were briefly that plaintiff's husband, a citizen of Kansas, was killed by the alleged negligence of his employer, a non-resident of that state. The plaintiff, however, anticipating an effort to remove the cause to the federal court, impleaded as a co-defendant the foreman of the employer-defendant, who was a citizen of Kansas. The cause was removed to the federal court. Upon a motion to remand, the opinion was delivered by Pollock, District Judge. Lack of space alone prevents our reproducing the entire opinion, for it will repay careful examination. The following extracts, however, must suffice:

"The petition is framed on the theory that defendants are joint wrongdoers, and jointly liable in damages for the death of David C. Shaffer. If so, the case